

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Spectrum Horizons)	ET Docket No. 18-21
)	
Battelle Memorial Institute Petition for)	RM-11713 (Terminated)
Rulemaking to Adopt Fixed Service Rules in)	
the 102-109.5 GHz Band)	
)	
Request for Waiver of ZenFi Networks, Inc.)	WT Docket No. 15-245
and Geneva Communications LLC)	(Terminated)
)	
James Edwin Whedbee Petition for Rulemaking)	RM-11795
to Allow Unlicensed Operations in the 95-1,000)	
GHz Band)	

COMMENTS OF INMARSAT INC.

Inmarsat respectfully submits these Reply Comments on the Federal Communications Commission (“Commission”) initiative to make spectrum above 95 GHz more readily accessible for new innovative services and technologies, in the above referenced Notice of Proposed Rulemaking (“NPRM”).¹

Inmarsat supports the Commission’s approach in this proceeding to provide incentives and opportunities for investment in the development of innovative new technologies and services as well as the Commission’s recognition that services and devices that might be developed in this spectrum are not yet known.² Inmarsat fully support the comments submitted by the Satellite

¹ *Spectrum Horizons*, ET Docket Number 18-21 (“NPRM”)

² *See NPRM* at Para. 2

Industry Association (SIA)³ in this proceeding and is of the view that these comments put forward an appropriate balance of allowing operations in spectrum above 95 GHz while maintaining portions of spectrum for the introduction of new services in the future. At this stage the Commission should not favor one service over another and should certainly not adopt policies or rules that specifically exclude any service as suggested by some commenters.⁴

Inmarsat believes that the Fixed Service (FS) may be among the first to commercially deploy in these bands and that the 36 GHz of spectrum identified in the NPRM that is not shared with satellite services will provide adequate spectrum resources for these operations as well as future FS innovation.⁵ Given the large amount of spectrum available between 95 to 275 GHz and the nascent nature of technology in these bands the Commission should proceed with caution and not prematurely adopt licensing regimes based on decisions taken in lower frequency bands without a clearer picture of the types of services, use cases, and spectrum requirements for services that will eventually operate in this spectrum. For example, Inmarsat supports the point made by SIA that siting restrictions of satellite earth stations adopted in the 28 and 37/39 GHz bands under the Spectrum Frontiers proceeding are not appropriate for bands above 95 GHz.⁶

Inmarsat urges the Commission to move through the rulemaking process recognizing that services that can be provided in this spectrum range, including satellite services, will continue to evolve and that the regulatory framework that would ensure efficient use of the spectrum and provision of services to U.S. consumers may be significantly different from that which the Commission has adopted in lower frequency ranges. Any rules adopted should acknowledge this

³ See Satellite Industry Association Comments (“SIA comments”)

⁴ See *T-Mobile comments* Page 13.

⁵ See *NPRM* at Para 31.

⁶ See SIA comments Page 12.

expected evolution of services and encourage the future use of these frequency bands by a variety of services, including satellite services.

Respectfully submitted,

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